

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** § **CASE NO. 08-34031-H4-7**  
**TEXAS STANDARD OIL** §  
**COMPANY** §  
**DEBTOR** §

**Trustee's Motion to Abandon Estate's Interest  
in the Undivided Leasehold Interests in Block 34, West Delta  
Area, Offshore, LA; Calcasieu Lake South Prospect, Cameron  
Parish, LA; Main Pass Area Block 7, Offshore, LA; and,  
Catapult Trend Area, Cameron, Vermillion & Iberia Parishes**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

**Represented parties should act through their attorney.**

**TO THE HONORABLE JEFF BOHM, UNITED STATES BANKRUPTCY JUDGE:**

Rodney Tow, Trustee for Texas Standard Oil Company, files his Motion to Abandon Estate's Interest in the Undivided Leasehold Interests in Block 34 West Delta Area, Offshore, LA; Calcasieu Lake South Prospect, Cameron Parish, LA; Main Pass Area Block 7, Offshore, LA; and Catapult Trend Area, Cameron, Vermillion & Iberia Parishes, ("the Leases"), and in support thereof would show as follows:

1. On June 26, 2008, the Debtor filed a Voluntary Petition under Chapter 11 of Title 11 of the United States Code.
2. On April 2, 2009, this Court entered an Order converting the case to a Chapter 7 Proceeding. Rodney Tow was appointed Trustee, qualified, and continues to act in that capacity.
3. The Debtor still holds an undivided leasehold interest in the following leases:
  - a. Block 34, West Delta Rea, Offshore, LA, more particularly described as: OCS-G 03414, dated January 1, 1977, by and between the United States of America, as Lessor, and Transco Exploration Company, Freeport Oil Company, Energy Development Corp., and Pioneer Production corp., as Lessee over the N/2 of Block 34 West Delta Area, Offshore, Louisiana, as shown on OCS Official leasing map, Louisiana Map No. 8;
  - b. Calcasieu Lake South Prospect, Cameron Parish, LA, (Davis Trust Well), more particularly described as: a 3.1666666% interest in Test Well before Casing Point; 2.375000% interest in Test Well after Casing Point; and 2.375000% interest in Subsequent Wells;
  - c. Main Pass Area Block 7, Offshore, LA, more particularly described as: a 1.950647% leasehold interest in Main Pass Area Block 7, Offshore, LA; and,
  - d. Catapult Trend Area, Cameron, Vermillion & Iberia Parishes, more particularly described as: an undivided leasehold interest in: Catapult Trend Area, Cameron,, Vermillion and Iberia Parishes, LA (Thumbs Up Prospect), a 6.000000% interest in Test Well before Payout, a 5.250000% interest in Test Well after Payout, and a

5.25000% interest in Subsequent Wells.

4. The Trustee contacted a Mr. Tom Engelhart, an individual who specializes in evaluating and selling oil and gas interests to determine the approximate value of the Estate's interest in the Leases and was informed that they did not have any true value based on the status of the leases.
5. In addition, the Trustee's paralegal sent information regarding the Leases to all of the Trustee's contacts who routinely purchase oil & gas leasehold interests and none of the contacts were interested in making an offer on the leases.
6. Due to the continuing potential administrative costs to this Estate, the Trustee requests that this Court enter an Order abandoning the Estate's interest in the Undivided Leasehold Interests in Block 34 West Delta Area, Offshore, LA; Calcasieu Lake South Prospect, Cameron Parish, LA; Main Pass Area Block 7, Offshore, LA; and Catapult Trend Area, Cameron, Vermillion & Iberia Parishes.

Respectfully submitted this 7<sup>th</sup> day of May, 2010.

**TOW & KOENIG, PLLC.**

/s/ Rodney Tow  
Rodney Tow  
Federal ID# 3196  
Tex. Bar No. 20152500  
Tow & Koenig, PLLC  
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**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing has been served by Nicole Oakley, a legal assistant in my office, on all of the parties on the attached service list, including all parties requesting notice, via either ECF notification, e-mail, or first class mail, proper postage affixed, on the 7<sup>th</sup> day of May, 2010.

*/s/ Rodney Tow*

**Rodney Tow**

Label Matrix for local noticing

0541-4

Case 08-34031

Southern District of Texas

Houston

Fri May 7 14:43:10 CDT 2010

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Mariner Energy, Inc.

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Houston, TX 77210-4346

Merit Energy Company

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Texas Standard Oil Company

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William G. West, P.C., CPA

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4

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ATTN: Chris Barnes

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Harris County et al

c/o John P Dillman

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(p)INTERNAL REVENUE SERVICE

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

IRS, Special Procedures  
1919 Smith STOP 5024HOU  
Houston, TX 77002

(d)Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 21126  
Philadelphia, PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Carson Rollins, LLC

(u)Coldren Resources, L.P.

(u)Forest Oil Corporation

(u)Schully, Roberts, Slattery & Marino

(u)Tow & Koenig, PLLC

(u)mariner energy resources, inc.

End of Label Matrix  
Mailable recipients 40  
Bypassed recipients 6  
Total 46